PFE/REP Sept. 2022 GJ # 34

IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ALABAMA MIDDLE DIVISION

UNITED STATES OF AMERICA)
)
V.)
)
ISAIAH KHAWME ALEXANDER and)
NATHANIEL JAHIEM ALEXANDER)

INDICTMENT

COUNT ONE: [18 U.S.C. §§ 922(a)(5) and (2)]

The Grand Jury charges that:

On or about the 29th day of November, 2021, in DeKalb County, within the Northern District of Alabama, and elsewhere, the defendants,

ISAIAH KHAWME ALEXANDER and NATHANIEL JAHIEM ALEXANDER,

not being a licensed importer, manufacturer, dealer, and collector of firearms, did willfully attempt to transfer, sell, trade, give, transport, or deliver a firearm(s), that being, a Taurus PT111 Millennium G2 9mm semiautomatic pistol, serial number TJR70422, a Glock GMBH 43X 9mm semiautomatic pistol, serial number BRKB186, a Palmetto State Armory PA-15 multi-caliber semiautomatic pistol,

serial number SCD173057, an Aero Precision X15 multi-caliber semiautomatic serial number X333812, an Aero Precision M4E1 pistol, multi-caliber semiautomatic pistol, serial number M4-0135480, a Glock GMBH 30S .45 caliber semiautomatic pistol, serial number xxx (obliterated), a Glock GMBH 19GEN4 9mm semiautomatic pistol, serial number xxx (obliterated), a Glock GMBH 45 9mm semiautomatic pistol, serial number xxx (obliterated), a Glock GMBH 40GEN4 10mm semiautomatic pistol, serial number xxx (obliterated), an FMK Firearms, Inc. 9C1 GEN2 9mm semiautomatic pistol, serial number xxx (obliterated), a Bravo Company Mfg., Inc. BCM 4 multi-caliber semiautomatic rifle, serial number xxx (obliterated), a Palmetto State Armory M4 Carbine 5.56 caliber semiautomatic pistol, serial number xxx (obliterated), a Romarm Cugir SAR-1 7.62 caliber semiautomatic rifle, serial number xxx (obliterated), and an unknown make and model ZZ caliber semiautomatic pistol, serial number xxx (obliterated), to another person who was not a licensed importer, manufacturer, dealer, and collector of firearms, knowing and having reasonable cause to believe that such person did not then reside in the state in which the defendant then resided, that being, the State of Texas, in violation of Title 18, United States Code, Sections 922(a)(5) and 2.

COUNT TWO: [18 U.S.C. § 922(k)]

The Grand Jury charges that:

On or about the 29th day of November, 2021, in DeKalb County, within the Northern District of Alabama, the defendants,

ISAIAH KHAWME ALEXANDER and NATHANIEL JAHIEM ALEXANDER,

did knowingly possess and receive a firearm(s), that being, a Glock GMBH 30S .45 caliber semiautomatic pistol, serial number xxx (obliterated), a Glock GMBH 19GEN4 9mm semiautomatic pistol, serial number xxx (obliterated), a Glock GMBH 45 9mm semiautomatic pistol, serial number xxx (obliterated), a Glock GMBH 40GEN4 10mm semiautomatic pistol, serial number xxx (obliterated), an FMK Firearms, Inc. 9C1 GEN2 9mm semiautomatic pistol, serial number xxx (obliterated), a Bravo Company Mfg., Inc. BCM 4 multi-caliber semiautomatic rifle, serial number xxx (obliterated), a Palmetto State Armory M4 Carbine 5.56 caliber semiautomatic pistol, serial number xxx (obliterated), a Romarm Cugir SAR-1 7.62 caliber semiautomatic rifle, serial number xxx (obliterated), and an unknown make and model ZZ caliber semiautomatic pistol, serial number xxx (obliterated), the importer's and manufacturer's serial number(s) having been removed, obliterated, and altered, which had been shipped and transported in interstate and foreign

commerce, in violation of Title 18, United States Code, Section 922(k).

NOTICE OF FORFEITURE

[18 U.S.C. § 924(d) and 28 U.S.C. § 2461(c)]

- 1. The allegations contained in Counts One and Two of this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 924(d) and Title 28, United States Code, Section 2461(c).
- 2. Upon conviction of the offenses in violation of Title 18, United States Code, Sections 922(a)(5) and 2 and Section 922(k) set forth in Counts One and Two, respectively, of this Indictment, the defendants,

ISAIAH KHAWME ALEXANDER and NATHANIEL JAHIEM ALEXANDER.

shall forfeit to the United States pursuant to Title 18, United States Code, Section 924(d) and Title 28, United States Code, Section 2461(c), any firearms, ammunition, magazines, and firearms parts involved in the commission of the offenses, including, but not limited to, a Taurus PT111 Milennium G2 9mm semiautomatic pistol, serial number TJR70422, a Glock GMBH 43X 9mm semiautomatic pistol, serial number BRKB186, a Palmetto State Armory PA-15 multi-caliber semiautomatic pistol, serial number SCD173057, an Aero Precision X15 multi-caliber semiautomatic

serial number X333812, an Aero Precision M4E1 multi-caliber pistol,

semiautomatic pistol, serial number M4-0135480, a Glock GMBH 30S .45 caliber

semiautomatic pistol, serial number xxx (obliterated), a Glock GMBH 19GEN4

9mm semiautomatic pistol, serial number xxx (obliterated), a Glock GMBH 45 9mm

semiautomatic pistol, serial number xxx (obliterated), a Glock GMBH 40GEN4

10mm semiautomatic pistol, serial number xxx (obliterated), an FMK Firearms, Inc.

9C1 GEN2 9mm semiautomatic pistol, serial number xxx (obliterated), a Bravo

Company Mfg., Inc. BCM 4 multi-caliber semiautomatic rifle, serial number xxx

(obliterated), a Palmetto State Armory M4 Carbine 5.56 caliber semiautomatic

pistol, serial number xxx (obliterated), a Romarm Cugir SAR-1 7.62 caliber

semiautomatic rifle, serial number xxx (obliterated), and an unknown make and

model ZZ caliber semiautomatic pistol, serial number xxx (obliterated),

All pursuant to 18 U.S.C. § 924(d) and 28 U.S.C. § 2461(c).

A TRUE BILL

/s/ Electronic Signature

FOREPERSON OF THE GRAND JURY

PRIM F. ESCALONA United States Attorney

/s/ Electronic Signature RUSSELL E. PENFIELD

Assistant United States Attorney

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